

To: Galarza-Hernandez, Arlin[Galarza-Hernandez.Arlin@epa.gov]
From: Bernard Bigham
Sent: Wed 1/15/2014 11:35:16 PM
Subject: Question

I have nothing to do with this case, but I was wondering EPA made a determination concerning which, if any, federal program possibly has jurisdiction in last week's Charleston, WVA tank release of 4-methylcyclohexane methanol?

I know in Maryland that legislation intending to include ethanol in the tank program (as a result of the ethanol activity at Mid States Oil/Atlantic Terminalling) probably also included methanol. But I have heard conflicting opinions. If one of my clients was storing the same (or a similar product) I would (and have) insisted that it be included any SPCC Plan that I wrote. Just curious what the federal take on this is.

Should 4-methylcyclohexane methanol be included in facility SPCC Plans? How about other types of Methanol?

Thanks Bernie Bigham (410) 686-8070

FYI, Senator Manchin (D-WV) clearly adheres to the adage "Never let a crisis go to waste." See below:

http://www.huffingtonpost.com/2014/01/15/joe-manchin-chemical-spill-west-virginia_n_4604347.html